

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

Lakesha Smith

Plaintiff,

V.

St. Joseph's/Candler Health System, Inc.

Defendant.

Case No. 4:17-cv-00116-WTM-GRS

Status Report

Pursuant to the Scheduling Order (Dkt. 19), the parties submit this status report.¹

Pending Motions

St. Joseph's/Candler Health System, Inc. ("St. Joseph's") filed a motion to dismiss in October 2017. That motion is fully briefed. (See Dkt. 12, 12-1, 15, 17.)

St. Joseph's recently filed a motion to stay discovery pending resolution of its motion to dismiss. (Dkt. 23.) Smith intends to oppose the motion.

Discovery

The parties have not completed discovery. Smith stated that she collected documents and mailed them to counsel for St. Joseph's, but counsel has not received any documents.

1 Counsel for St. Joseph's drafted this report and sent it to Smith. Counsel then called Smith and asked her to review the report and enter any comments she had. In a response email, Smith stated that she was "not in agreement with the stay motion." She did not mention the report and did not attach any edits.

St. Joseph's is waiting to see how its two motions are resolved before scheduling depositions.

The parties do not have any discovery disputes for the Court to address at this time.

Settlement

The parties discussed settlement as part of their Rule 26(f) conference. Smith proposed a settlement for \$1 million. (She disclosed her offer by filing it with the Court. *See* Dkt. 20.) St. Joseph's declined.

Expert Witnesses

Smith has not disclosed any expert witnesses to St. Joseph's. (*See* Dkt. 19 (January 19, 2018 deadline for plaintiff's expert disclosures, if any).)

St. Joseph's deadline for expert disclosures is February 18, 2018. (*Id.*)

Future Proceedings

St. Joseph's proposes that the Court schedule another status conference for early March so that any discovery disputes can be addressed before the close of discovery on March 12, 2018.

If the motion to dismiss is denied, then St. Joseph's intends to file a motion for summary judgment at the close of discovery.

January 22, 2018

LAKESHA SMITH
Plaintiff

s/ Lakesha Smith

*signed with Ms. Smith's implicit permission;
see footnote 1
-ACDC*

MORRIS, MANNING & MARTIN, LLP
*Attorneys for St. Joseph's/Candler Health
System, Inc.*

s/ R. Jason D'Cruz

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Certificate of Service

I hereby certify that I have this 22nd day of January, 2018, I served a copy of the previous **Status Report** upon all parties to this matter. I served these documents by filing a copy via CM/ECF and by mailing a copy, proper postage prepaid, to the address below:

Lakesha Smith
2609 Evergreen Ave
Savannah, GA 31404

Plaintiff

MORRIS, MANNING & MARTIN, LLP
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s/ R. Jason D'Cruz
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